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UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY

MDL NO. 2875

LITIGATION.

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Janice Brown v. Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC, et al.

NOTICE OF VIDEOTAPED DEPOSITION OF

PLAINTIFF JANICE BROWN

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Janice Brown on June 23, 2021 at 10:00 a.m. CDT (11:00 a.m. EST) at 7433 Weaver Avenue, New Orleans, Louisiana 70127. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Jill H. Fertel, Esquire CIPRIANI & WERNER, P.C. 450 Sentry Parkway East Suite 200 Blue Bell, PA 19422 (610) 567-0700 jfertel@c-wlaw.com

Date: May 24, 2021 Respectfully submitted,

/s/Jill H. Fertel

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Attorney for Defendants Aurobindo Pharma USA, Inc., Aurobindo Pharma Ltd., and Aurolife Pharma LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of May, 2021, a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Janice Brown was served upon the following by e-mail and ECF, with copies to Counsel for Plaintiff and all counsel of record by ECF:

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/s/ *Jill H. Fertel*Jill H. Fertel